



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

June 24, 1993

Mr. James Shafer
Northern Division
Naval Facilities Engineering Command
Code 1821/JS
10 Industrial Hwy., Mail Stop #82
Lester, PA 19113-2090

Re: Draft Record of Decision
Sites 5 and 6
Nas Brunswick

Dear Jim:

The United States Environmental Protection Agency (EPA) has reviewed the document entitled "Draft Record of Decision for a Remedial Action at Sites 5 and 6, Naval Air Station Brunswick, Brunswick, Maine" dated June 1993.

EPA's comments regarding this document are provided in Attachment I to this letter. Upon satisfactory response to our comments, EPA anticipates that we will provide concurrence on this ROD.

In order to facilitate the finalization of the ROD, EPA recommends that a meeting or conference call be scheduled to discuss the attached comments and the Navy's responses. Please contact me at (617) 573-5785 to arrange such a meeting/conference call.

Sincerely,

Meghan F. Cassidy
Meghan F. Cassidy
Remedial Project Manager

Enclosures

cc: Nancy Beardsley/ME DEP
Jim Caruthers/NASB
Bob McGirr/ABB
Susan Weddle/BASCE
Sam Butcher/Harpswell Community Rep.
Rene Bernier/Topsham Community Rep.
Bob DiBiccaro/EPA
Bob Lim/EPA



ATTACHMENT I

The following are EPA's comments pertaining to the document entitled "Draft Record of Decision for a Remedial Action at Sites 5 and 6, Naval Air Station Brunswick, Brunswick, Maine" dated June 1993.

1. General: The Technical Memorandum names the Preferred Alternative as 5,6-E. According to the ROD, the selected alternative is 5,6-F. This should be clarified.
2. Page iv, Table 2: The alternative should be called alternative 5,6-F.
3. Page 3, ¶ 2, 2nd line: The word "and" as it appears after the words "handling asbestos-contaminated material;" should be deleted from the text.
4. Page 4, 4th and 5th lines: Hyphens should be added in the term "ex-situ vitrification" and "in-situ vitrification".
5. Page 4, ¶ 2, 1st line: Insert "nonhazardous" before the word "debris".
6. Pages 5 and 6: The language on these signature pages should be changed to read as follows:

"The foregoing represents the selection of a remedial action by the Department of the Navy, and the U.S. Environmental Protection Agency, Region I, with concurrence of the Maine Department of Environmental Protection."
7. Page 6: The Navy should contact EPA just prior to the final printing of the ROD to confirm who will sign the ROD for EPA Region I.
8. Page 7: The signature page for the Maine Department of Environmental Protection should be deleted. As was the case for previous signed RODs for NAS Brunswick, only the Navy and EPA should sign the ROD. The state should provide a letter of concurrence. This is necessary to comply with Section 120 of CERCLA which states that selection of a remedial action shall be made by the head of the relevant department (Navy) and the Administrator (EPA).
9. Page 11, Figure 2: The figure should explain what the lines labeled "C.L.L." and "s" signify. In addition it should be made clear that this is not the site as it exists today, but how it will look during remediation.
10. Page 14, ¶ 2, 1st line: The word "site" in this sentence should be changed to "sites".

11. Page 15, ¶ 2, 6th line: The sentence ends in a preposition. The word "of" is not needed and should be deleted.
12. Page 17, ¶ 2: This paragraph discusses groundwater sampling results from Site 6. The paragraph needs to be revised to include a discussion explaining that groundwater at Site 5 was not investigated and the rationale for this decision.
13. Page 20: The text should indicate that a final ROD for Sites 1 and 3, and an Interim ROD for the Eastern Plume have been signed.
14. Page 21, ¶ 2: This paragraph should include the date of the public hearing for Sites 5 and 6.
15. Page 23, 4th and 5th sentence: These sentences should be revised to read as follows:

"This fill material is needed to meet regulatory design criteria for cover system slopes and promote positive drainage away from the cap at Sites 1 and 3. The landfill cap exceed both MEDEP regulations for closure of asbestos waste disposal sites and RCRA Subtitle D requirements for closure of solid waste landfills."
16. Page 25, ¶ 3: This paragraph says that there was no evidence of exposed asbestos materials found in the vicinity of either site. However, earlier in the text (page 12) there is mention of asbestos lined pipes which were observed protruding from the surface. Based on this, the sentence should be rewritten as follows.

Although asbestos-lined pipe were seen protruding from the surface at Site 6 in the past (Roy F. Weston Inc., 1983), no evidence of exposed asbestos materials currently exists at either Site 5 or 6."
17. Page 27, ¶ 2: The first sentence indicates that groundwater beneath Site 5 is estimated to be 25 to 30 feet bgs. The text should explain the basis for this statement.

The first sentence also indicates that the depth to groundwater beneath Site 6 is estimated to be 15 to 20 feet bgs. This depth is not an estimated depth since groundwater monitoring wells were installed at Site 6. This should be clarified in the text.
18. Page 29, ¶ 1, last sentence: The word "Subsections" should be changed to "paragraphs" since as presented all of the risk information is included in one section.

19. Page 30, ¶ 2, 3rd line: Change the word "site" to "sites".
20. Page 30, ¶ 2: The following language (which was used in the Sites 5 and 6 Proposed Plan) should replace the 5th, 6th and 7th sentences of this paragraph.

"Any asbestos present at depth is considered to be stable and not likely to migrate. While there is a human health risk associated with future potential exposure to asbestos during construction or excavation-related activities, quantitative risks cannot be estimated because no subsurface samples were collected."
21. Page 30: Add text summarizing the results of the environmental risk assessment.
22. Page 33, ¶ 1, 5th line: The word "the" which appears after (5) should be deleted.
23. Page 36, ¶ 1: This paragraph should mention the technical memorandum prepared for Sites 5 and 6 and what this document contains.
24. Pages 38, 39, 40 and 43: A footnote needs to be added under all of the Sites 5 and 6 cost estimates that presents the discount factor used to calculate the net present worth costs.
25. Page 40, ¶ 1: Include volume estimates of material to be excavated from each of the sites.
26. Page 40, ¶ 2, 2nd sentence: The sentence should be revised to read as follows.

"The sampling plan would identify the sampling frequency for collecting soil samples from the side walls and bottom of the excavation at both Sites 5 and 6."
27. Page 40, ¶ 2: The last sentence that begins on this page, and is completed on page 41, indicates that the Maine DEP will provide oversight during confirmation sampling. While the State has the ability to take split samples and provide oversight at any time during the investigation or clean-up of the site, inserting this language in the ROD is not appropriate. The ROD is a legal document which must be adhered to during the remedial action. The language here would require that Maine DEP be onsite, providing oversight at all times during confirmation sampling. If for any reason (i.e., scheduling problems, lack of resources, etc.) Maine DEP could not be onsite work would have to cease or the Navy would be in non-compliance with the ROD.

28. Page 42, ¶ 2, 3rd sentence: Add "as well as the federal solid waste requirements" to the end of this sentence.

29. Page 43, ¶ 1, 1st sentence: The end of this sentence should be modified to read as follows.

"...and transporting these materials, as well as the stockpiled soil at Site 6, for use as subgrade fill beneath the landfill cap to be constructed at Sites 1 and 3."

30. Page 43, ¶ 1, 2nd sentence: The beginning of this sentence should be modified to read as follows.

"The Sites 1 and 3 landfill cap..."

31. Page 43, ¶ 1: This paragraph should indicate that the cap to be constructed at Sites 1 and 3 was selected as the remedy for these sites in a June 1992 ROD.

32. Page 43, ¶ 2, 2nd sentence: The sentence should be revised to read as follows.

"The sampling plan would identify the sampling frequency for collecting soil samples from the side walls and bottom of the excavation at both Sites 5 and 6."

33. Page 43, ¶ 2, last sentence (continues on page 44): As stated previously, language regarding Maine DEP's role in oversight during implementation of the remedial action should not be addressed in the ROD.

34. Page 49, ¶ 2: Only alternatives 5, 6A-D are presented in Tables 5-4 and 6-4 of the FS. The text should clarify this as well as indicate a comparative analysis of the additional alternatives can be found.

35. Pages 50 through 58: The text under each of the criteria headings presented here should be revised to focus first on how the selected alternative meets each criteria (i.e., The selected alternative...). The text should then evaluate the remaining alternatives. Refer to the appropriate sections in the final ROD for Sites 1 and 3, and the draft final ROD for Site 8.

Throughout these pages, the text refers to the Preferred Alternative. The remedy should consistently be referred to as the Selected Alternative since this is the ROD.

36. Page 50, **Compliance with Applicable or Relevant and Appropriate Requirements:** This section should refer the reader to Appendix C-1 for additional information on ARARs.
37. Page 53, **Reduction of Toxicity, Mobility or Volume through Treatment:** The language presented on pages 3 and 4 (the Declaration) regarding this issue is more specific regarding this statutory determination. This same language should be repeated in this section.
38. Page 54, ¶ 1, 2nd to last line: Add "asbestos" after the word "excavated".
39. Page 55, last sentence: The text inaccurately indicates that no special labor would be required to implement any of the alternatives. However, any of the alternatives that include excavation and movement of asbestos will require licensed asbestos abatement contractors.
40. Page 56, ¶ 1, 2nd line: The term "preceding section" should be replaced with "Section VII, Description of Alternatives".
41. Page 56, ¶ 2, 4th line: Insert the term "five-year" in front of "review costs".
42. Page 57, ¶ 1: This discussion should also indicate that using the materials from Sites 5 and 6 as subgrade at Sites 1 and 3 will also decrease the costs by decreasing the amount of fill needed at Sites 1 and 3.
43. Page 60, ¶ 1, 1st line: "Preferred Alternative" should be deleted and "Navy's selected alternative" used instead.
44. Page 64, ¶ 2, 2nd line: The 6 mil polyethylene seems fairly thin. Confirm that this is the NESHAP requirement.
45. Page 67, ¶ 1: This paragraph should mention the ROD that has been signed for Sites 1 and 3.
46. Pages 69 and 70, Table 2: The alternative presented here is incorrectly labeled. It should be "Alternative 5,6-F".
47. Page 71, ¶ 2: This paragraph should be rewritten as follows since treatment is not a component of the selected alternative.

"The remedy at Sites 5 and 6 will permanently reduce the risks posed to human health and the environment by eliminating, reducing, or controlling exposures to asbestos by human and environmental receptors through engineering controls."

48. Page 73, ¶ 1: The paragraph should end after the phrase "design at Sites 1 and 3" in the third line. The rest of the information presented here is not really pertinent to the Sites 5 and 6 material.
49. Page 75, Action-specific ARARs: Add RCRA Subtitle D to this list of ARARs. Also include a discussion of this ARAR in the subsequent text.
50. Page 77, **Federal and State Drinking Water Regulations**: The rationale for providing a discussion of the drinking water regulations is not clear since earlier in the ROD it is stated that the presence of asbestos in groundwater is not likely. If this section remains in the text greater detail is needed to explain why groundwater at Site 6 was investigated and why groundwater at Site 5 is not. A second option would be to omit this section of the text and present these ARARs in Appendix C tables only.

If the text is removed from this section, reference to these ARARs should be omitted from page 74 as well.

51. Page 77, **Federal and State Air Quality Regulations**: A discussion regarding the applicability of NESHAPs must be included in this section of the text.
52. Page 78, **Federal and State Hazardous Waste Regulations**: This section should include a brief discussion explaining why RCRA Land Ban Requirements are not ARARs in this situation.
53. Page 79, 1st line: Clarify what "toxic constituents" are present in the soil at Site 6.
54. Page 79, ¶ 2, 5th line: None of the alternatives include a treatment plant. Therefore, delete the phrase "treatment plant in operation" from the text.
55. Page 79, ¶ 3, 1st line: Again clarify what is meant by "toxic constituents".
56. Page 79, last paragraph: A heading reading **Federal and State Solid Waste Regulations** should be inserted in the text before this paragraph.

In addition, this section should include discussion on both state and federal solid waste and asbestos regulations.

57. Page 82, ¶ 2, 1st line: The text should read "The Navy's Selected Alternative" as opposed to "The Navy's Preferred Alternative".

58. Page 83, ¶ 2: The language presented on pages 3 and 4, of the Declaration, regarding the lack of treatment technologies available for asbestos is more specific and should be inserted in this paragraph.
59. Page 84: The purpose of this section of the ROD is to document any significant changes which have been made in the selected alternative from the proposed plan that was presented for public comment. Since the alternative presented in this ROD is identical to that presented in the proposed plan, the section should be renamed "**Documentation of No Significant Changes**". The text of this section should be consistent with the model ROD language since the final alternative is identical to the proposed plan. While the text can explain that additional alternatives were considered after completion of the FS this should not be the focus of the section.
60. Page 84: The first sentence of this paragraph indicates that a preferred alternative was selected in the FS. This information is not appropriate for this section as described above. In addition an FS document does not select an alternative.